

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

DRAFT

Title V / Synthetic Minor, Operating

Permit: V-08-005

Gerdau Ameristeel US Inc.

Calvert City, KY 42029

March 7, 2008

Rita Arguello, Reviewer

SOURCE ID: 21-157-00029

AGENCY INTEREST: 2956

ACTIVITY: APE20070001

SOURCE DESCRIPTION:

Gerdau is a manufacturer of steel sheets from billets. The billets are heated in a natural gas rehear furnace, and the hot billets are rolled into sheets. In addition, steel recovered from the rolling operation is sold as scrap.

On December 14, 2007, Gerdau Ameristeel US Inc. (Gerdau) applied to the Division for the renewal of the Title V air permit, V-03-016. This source is major for Particulate Matter and Nitrogen Oxide. Gerdau requested to increase the time allowed to complete performance testing for the emission point 01 because of difficulties in performing the test in the winter. The EP 01 passed compliance stack testing in July, 2007. They also requested to modify the description language for the Emission Point 01 and 02.

On November 10, 2004, Gerdau notified the Division for Air Quality that, North Star Steel a Delaware corporation, was purchased by Gerdau Ameristeel US Inc., a Florida corporation.

COMMENTS:

The source does not have control equipment.

Emission factors of the source are based on performance stack test and AP-42 factors for combustion and a worst case estimate for steel emissions.

Applicable regulations:

- 1) Emission point number 01 and 02 are subject to regulation 401 KAR 59:010 and Emission point 05 is subject to regulation 401 KAR 63:010.
- 2) Regulation 401 KAR 51:017 is not applicable because this source is not in the 28 category list.

EMISSION AND OPERATING CAPS DESCRIPTION:

Potential emissions of PT exceed 100 tons per year and NO₂ exceed 100 tons per year. Thus, the Gerdau Ameristeel US Inc. facility continues with the classification as a major source under the Title V permit program. The source requested a limit on nitrogen and particulate allowable to preclude the applicability of 401 KAR 51:017, Prevention of significant deterioration of air quality.

PERIODIC MONITORING:

EP 02;

The particulate emissions and steel processing rates shall be monitored to ensure compliance with the emissions limitation. Particulate emissions shall not exceed 40 tons per 12 month rolling average.

EP 01:

The particulate emissions, nitrogen oxide emissions, steel processing and natural gas usage rates shall be monitored to ensure compliance with the emission limitations.

Natural gas usage shall not exceed 1400 mm scf per 12 month rolling average.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.